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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	
)	
Implementation of the Local Competition)	CC Docket No. 96-98
Provisions in the Telecommunications Act)	
of 1996)	
)	
)	

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COMMENTS OF THE SECRETARIAT OF THE SECOND NETWORK RELIABILITY COUNCIL

The Secretariat of the 1994-1996 Network Reliability Council[1] (NRC or

Council) submits these comments with respect to the Notice of Proposed

Rulemaking (NPRM) in the above captioned proceeding, adopted by the

Commission April 19, 996.

The NRC is a Federal Advisory Committee of CEO-level representatives of

wireline and wireless common carriers, cable television interests, satellite

interests, large and small consumers of telecommunications services, and

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[1] The Secretariat of the second Network Reliability Council served as its principal administrative and liaison officer, reporting directly to the Chairman of the Council and coordinating the activities of the Council's Steering Committee and its five focus groups.

others.[2] It was first established under the Federal Advisory Committee Act[3] on January 6, 1992, to advise the Commission and the industry on ways to preserve and enhance telephone network reliability.[4] The Council was created following a series of telephone service outages in 1990 and 1991 that were associated with carrier maintenance activity and the introduction of new signaling technologies that now operate across multiple networks. The first Council, NRC I, conducted an extensive analysis of the causes of the telephone service outages, and other related matters, and prepared a 1000 page report that identifies nearly 300 practices that have been shown to help avoid outages or to mitigate their impact.[5]

In 1994, the Commission amended the Council's charter. The Council's membership also was revised to include representatives of the cable, satellite, computer, and terrestrial wireless industries. The amended charter asked the new Council to address issues not fully considered by the first Council,

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[2] The members of NRC II are listed in appendix A, attached hereto.

[3] 5 U.S.C. App. 2. Federal Advisory Committees enable the Federal Government to obtain independent, consensus advice from subject matter experts representing different interests who are not part of the government.

[4] See Letter to Director, Committee Management Secretariat, GSA, from Managing Director, FCC, November 27, 1991.

[5] Network Reliability: A Report to the Nation (1993, National Engineering Consortium). The output of NRC I has been incorporated into the Commission's regulatory program. Section 63.100 of the Commission's rules requires wireline telephone carriers to report, among other things, service outages that affect 30,000 customers for more than 30 minutes. The final incident reports must discuss the applicability of industry best practices to avoid such incidents.

including whether changing technologies and new interconnection arrangements that are expected over the next several years pose risks to reliability.

Though, in some ways, increased interconnection can actually improve network reliability from the end users' perspective by providing more opportunities for mutual aid and alternative routing, NRC I noted that the increasing number of telecommunications service providers and interconnected network configurations could make network reliability problems more difficult to solve. There was concern, as well, that there could be greater difficulty in identifying and isolating network problems to the responsible element or the entity so that it could be remedied while not affecting other parts of he network.[6] The Network Interconnection and the New Technologies Focus Groups of the second Network Reliability Council addressed these issues. Opportunities for mutual aid were considered by NRC II's Essential Communications and the Telecommuting Focus Groups.

On April 17, 1996, at the Network Reliability ConForum, the NRC recommendations published, under the title <u>NRC Network Reliability; The</u>

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[6] NRC I's Software and Switching System Focus Team concluded that the larger the number of service providers connected to the network, the more complex the reliability problem becomes because of the difficulty in identifying the problem and isolating it to the responsible element. The Team recommended simple, unambiguous interfaces between network elements and service providers. The team also found that as more and more software systems are run on heterogeneous machines manufactured by different suppliers "correct management of different versions of the software require a level of software control not currently found." Report to the Nation note 5, <u>supra</u>, at Section C, pp. 25, 33-37.

Path Forward (NRC II)[7] were presented to the telecommunications industry. At that event, FCC Chairman Hundt announced that the charter of the Council, renamed the "Network Reliability and Interoperability Council," was being revised and that the new Council - NRC III - was being asked to advise the Commission on, among other things, ways to effectively and efficiently accomplish its responsibilities designated in new Section 256 of the Communications Act to oversee coordinated network planning among providers of telecommunications service and to participate in the development of network interconnectivity standards.

NRC III is organizing to accomplish its responsibilities under the revised charter. Its leadership and some of its membership, will be different from that of NRC II. The point of these comments is to place findings of NRC II into the record of this proceeding and to discuss briefly parts of the NRC's report that might assist carriers in negotiating compatible interconnection arrangements and facilitate cooperative procedures.

The Secretariat encourages carriers to utilize the findings and recommendations contained in Network Reliability: The Path Forward when negotiating interconnection arrangements to minimize risks associated with network reliability issues. In this case, those findings relate to assessing

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[7] The NRC II Report is available on the internet at: http://www.fcc.gov/oet/info/standards/nrc and is available in hard copy and on CD Rom from the Alliance for Telecommunications Industry Solutions, (202) 628-6380.

reliability risks associated with network unbundling and interconnection. The findings of Focus Group II, Network Interconnection and Focus Group III, Changing Technologies, should be particularly useful to carriers.

CONCLUSION

The NRC II's Report represents consensus advice of the Council on addressing the issues the Council saw in accommodating new technologies and new service providers during the next several years. With the findings of NRC I, contained in A Report to the Nation, the industry has before it the benefit of 4 years of study and recommendations of technical experts who provide and use telecommunications service in this country. As carriers are guided by these findings and recommendations in matters of telecommunications network reliability, customers will be assured that reliability issues will not compromise all the gains that are expected from a more competitive telecommunications market structure.
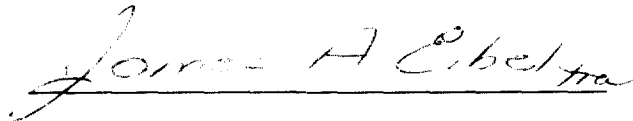
SUMMARY OF KEY FINDINGS

As Secretariat to NRC I, I encourage carriers to incorporate the recommendations of NRC II, in particular, to fully utilize information contained in the templates identified below that were developed by Task Groups II and III. Interconnection arrangements should be established and

implemented, under state and federal guidance, to ensure network reliability is not compromised by assuring compatability and joint cooperation between carriers.

- The templates developed by the Increased Interconnection Focus Group II, address issues associated with testing, installation, functionality, interoperability, performance etc.

- The template developed by the New Technologies Focus Group III, addresses issues associated with deploying new technologies in the network.

- Finally, as is noted above, the renewed Network Reliability and Interoperability Council -- has been asked to advise the Commission on how it might accomplish its oversight responsibilities for coordinated network planning and how it might participate in the development of internetwork in erconnectivity standards under Section 256 of the Act. While the Commission has called for comments on the interaction between section 251(a)(2), which references section 256, and will no doubt benefit from the advice of parties other than the Council on

these issues, we suggest that the Commission not unnecessarily
commit itself on hese matters by any rule implementing such advice
prior to receiving the findings and recommendations of NRC III.

Respectfully submitted,
Network Reliability Council II Secretariat

James A. Eibel
7613 Willaim Penn Place
Indianapolis, Indiana 46256

May 15, 1996

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* Associate Member